

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

COREY ANDERSON,	)	
	)	<b>No. 08 C 768</b>
Plaintiff,	)	
	)	
v.	)	JUDGE GETTLEMAN
	)	
OFFICER T. CAREY #18795, OFFICER D.	)	
BORA #19830, OFFICER B. TOWN #3559,	)	Magistrate Judge Denlow
OFFICER E. MAY #16474, OFFICER S.	)	
PICKETT #12737, and the CITY OF CHICAGO,	)	
	)	
Defendants.	)	

**DEFENDANT CITY OF CHICAGO'S AGREED MOTION FOR EXTENSION OF TIME  
TO ANSWER OR OTHERWISE PLEAD TO PLAINTIFF'S FIRST AMENDED  
COMPLAINT AT LAW**

Defendant City of Chicago ("City"), by its attorney, Mara S. Georges, Corporation Counsel for the City of Chicago, respectfully moves for an extension of time to April 17, 2008 to answer or otherwise plead in response to plaintiff's complaint. In support of this motion, the City states the following:

1. Plaintiff filed his complaint in the United States District Court, Northern District of Illinois, Eastern Division, on or about February 4, 2008. The City was due to answer on or about February 25, 2008.
2. Undersigned counsel for the City was assigned the case on or about February 21, 2008, the first opportunity that undersigned counsel had to review Plaintiff's complaint.
3. On March 5, 2008, the City filed its Motion for Extension of Time to Answer or Otherwise Plead to Plaintiff's Complaint. Before the Court entered an order pertaining to the motion, plaintiff filed his First Amended Complaint at Law ("First Amended Complaint") on

March 7, 2008.

4. The Office of the Corporation Counsel and the Chicago Police Department are still in the process of investigating the allegations in plaintiff's complaint and compiling the pertinent records.

5. This motion is the City's first request for an extension of time to answer or otherwise plead to plaintiff's First Amended Complaint. This request is made not to delay the proceedings but rather to allow the City to respond properly to the allegations in plaintiff's First Amended Complaint.

6. On March 20, 2008, undersigned counsel spoke by telephone with one of plaintiff's attorneys, Abbas Merchant of the Law Offices of Blake Horwitz, Ltd., who indicated that he would agree to the City's request for an extension of time.

WHEREFORE, Defendant City of Chicago respectfully requests that it be given an extension of time to April 17, 2008 to answer or otherwise plead in response to plaintiff's First Amended Complaint at Law; and for any other relief that this Honorable Court deems proper.

Respectfully submitted,

MARA S. GEORGES  
Corporation Counsel  
City of Chicago

BY: /s/ Thomas J. Aumann  
THOMAS J. AUMANN  
Assistant Corporation Counsel

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**CERTIFICATE OF SERVICE**

I hereby certify that I have caused true and correct copies of the above and foregoing **Notice of Motion** and **Defendant City of Chicago's Agreed Motion for Extension of Time to Answer or Otherwise Plead to Plaintiff's First Amended Complaint at Law** to be served upon Blake Horwitz at lobh@att.net, via electronic mail, on this 20th day of March, 2008.

/s/ Thomas J. Aumann  
THOMAS J. AUMANN  
Assistant Corporation Counsel